

FILED
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

MAY 22 2023

Clerk of Court

By: _____
Deputy 

In RE:) Case No. 22-00744
Debtor: Property Holders LTD,) Application/Motion to Pay Property Holders'
Debtor and Debtor-in-Possession) Administrator's Salary/Expenses as an
) Administrative Expense During Pendency of
) Chapter 11, Sub Chapter V Bankruptcy

COMES NOW, Mari Davis, as (former) Administrator for Property Holders, LTD, and states as follows:

1. Mari Davis, (hereinafter, "Davis") was hired by Property Holders Ltd's owner, Charles Davisson, (hereinafter, "Davisson") and began serving as Administrator in managing rental properties for the company on or about August 3, 2021.
2. In her capacity as Administrator, Davis handled a wide range of tasks, all related to general management of rental properties from receipt of rental payments, to negotiating payment plans with tenants who may owe rent, late and/or other fees, and/or cost of service calls generated from tenant-generated maintenance or damages to working with city officials in resolving maintenance/repairs in property needed to conform to city ordinances and the city's housing code, as well as working with potential applicants to rent available properties including conducting a full background check regarding the applicant's history, and other tasks related to comprehensive management of rental property. Davis also drafted documents and mailing/posting or serving 3 Day or other Notices related to various tenants and rental properties, preparing petitions for Forcible Entry and Detainer and/or money damages actions, appearing in court as Property Holders' representative, proceeding with scheduling FED actions post-writ
3. Davis is uniquely qualified to serve in the capacity of Administrator for Property Holders Ltd as a successful and long-time owner and manager of rental housing (35+ years) and who has served as a consultant for other housing providers, especially those who may be inexperienced or who have issues with problem tenants who fail to conform to required lease/rental agreement requirements, as well as serving as the education coordinator for a statewide non-profit professional organization for rental property owners/managers and investors and has served as an advocate for housing providers regarding legislative or ordinance development impacting the rental housing market, particularly single family homes.
4. In her capacity as Administrator for Property Holders Ltd, Davis continued to provide services to Property Holders Ltd (and Davisson) at the time of the Chapter 11 bankruptcy

filing on November 21, 2022, as filed by Attorney Rush Shortley on Property Holders Ltd's behalf, as well as subsequent to the filing of the bankruptcy, on a full-time basis through January 31, 2023.

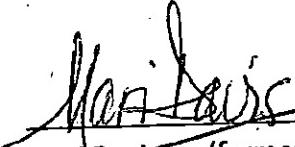
5. Thereafter, Davis has provided additional services during February and March 2023 on a reduced schedule as Davisson transferred certain tasks, especially the receipt of rental revenue, to himself. However, Davis continued to participate at the request of Davisson/Property Holders with Property Holders' attorneys Patrick and Peter Riley including needed discussions regarding status of pending cases, provision of documents related to pending cases, participating in edits of legal documents in pending cases, contacts with various tenants, follow-up on city required maintenance/repairs and apprising Davisson and Mike White of inspections and/or appointments related to inspections of rental homes, addressing the need for permits for certain repair activities, attendance at hearings as well as filing specific FED and/or money damages cases, drafting of various pleadings related to pending cases and other professional services.
6. Davis has attached as Exhibit A, an invoice that identifies costs for the time period subsequent to the November 21, 2022 filing of the bankruptcy action including nine (9) days for November, 2022 and at full value for the months of December, 2022 and January 2023, as well as a reduced schedule for the months of February and March 2023 with some functions diverted away from Davis' management, although Davisson did not speak in any detail with Davis regarding such and, in fact, continued to contact Davis to ask if she had received rent payments for certain tenants and to take care of other issues for Property Holders Ltd.
7. The professional services provided by Davis since November 21, 2022 represent those essential activities related to the daily conduct of business and management of rental properties as referenced previously and the provision of such professional services were not excessive for the period November 22, 2022 through and including January 31, 2023 as well as February through March 2023 and represent costs as agreed by Davis and Davisson when Davis began her employment, and were necessary in the ordinary course of business and pertinent to general operations as a housing provider with properties occupied by tenants for which rental agreements existed and as such, represent a priority in terms of creditor claims in bankruptcy and as defined by 11 US Code 507(a)(1).
8. Davis also incurred specific expenses that she paid out of pocket following the November 21, 2022 filing of the bankruptcy. These expenses represent standard costs that may be incurred in the provision of professional services and were pertinent in Property Holders Ltd's general operations as there were issues following the filing of the bankruptcy at which time Davisson claimed to have no funds available to provide for such activities and Davis determined the purchase of such items were necessary to carry out the normal functions of a rental management business including the purchase of such items as printer

ink, envelopes, mailing of notices, paper products including paper for printing of documents related to tenancy and envelopes for mailings and posting of notices, postage costs, and other office related supplies in order to carry out business functions. In certain circumstances, there was the purchase of thumb drives in order to download and preserve the text records of those tenants who had filed complaints against Property Holders and attorneys for Property Holders who requested to receive a copy of such texts to review in preparing responses in pending cases.

9. Davis requests that the Court approve the allowance requested for fees and expenses as sought through this Motion and authorize the Debtor, as debtor in possession, to pay the balance of the fees and expenses to Davis as approved by the Court (See Attachment A).

WHEREFORE, Davis prays that the Court, pursuant to 11 U.S.C., sections 503(b)(3)(D) and 507, enter an Order approving this Motion for Fees and Expenses and award compensation for services rendered and expenses in the amount of \$17,343.95 for the period referenced herein and direct the Debtor, as debtor-in-possession, to pay the balance of such fees and expenses as identified herein.

Dated May 22, 2023


Mari Davis, as (former) Administrator

Effective May 16, 2023

Property Holders Ltd

c/o 720 Center Point Rd NE

Cedar Rapids, IA 52402

PH: (319)373-1677

Email: iahomelocators@yahoo.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 22nd of May, 2023, the original of the foregoing document was filed through the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa as requested of the Clerk of Court using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF System.


Mari Davis, As (former) Administrator
Property Holders Ltd

Property Holders Ltd
PO Box 2328
c/o Center Point Rd NE
Cedar Rapids, IA 5202

Invoice

Number 1002

Date 5/21/2023

Bill To

Mari Davis
c/o 720 Center Poin Rd NE
Cedar Rapids, IA, 52402
Linn County

Ship To
SAME

Description	Amount
11/22/2022 - 11/30/2022 Administrative Management incurred following filing of bankruptcy including all operations regarding rental properties, drafting documents, mailing/posting of notices, contact w/ tenants/maintenance/owner/city staff, etc.	\$993.95
12/01/2023 - 12/31/2022 - Administrative mgmt including general operations; drafting documents/filing w/ Clerk' mailing/posting of notices; coordinate major repairs w/ tenants/maintenance/ownenr/contractors, etc.	\$5,000.00
01/01/2023 - 01/31/2023 - Administrative mgmt including general operations; drafting documents/filing w/ Clerk' mailing/posting of notices; coordinate major repairs w/ tenants/maintenance/ownenr/contractors, etc.	\$5,000.00
02/01/2023 - 02/28/2023 - (chrgd @ reduced rate w/considering workload reduction) cont. engagement in administrative mgmt including document drafting, mailing/posting-3 Day Notices; draft/file FED & money damages docs; various contacts, etc.	\$3,500.00
03/01/2023 - 03/31/2023 (see Feb 2023 description above w/ further reduction in hours; various contacts, texts, emails; contacts & mtgs w/ attorneys; provision of info in cases; document drafting/court filings, etc.	\$2,500.00
Administrative Expenses including copies, postage/mailings, plus purchase of needed office supplies incl ink, paper, various supplies, etc. needed to complete administrative work	\$350.00

0 - 30 days	31 - 60 days	61 - 90 days	> 90 days	Total
\$33,343.95	\$0.00	\$0.00	\$45,600.07	\$78,944.02

Property Holders Ltd
PO Box 2328
c/o Center Point Rd NE
Cedar Rapids, IA 5202

Invoice

Number 1002

Date 5/21/2023

Bill To

Mari Davis
c/o 720 Center Poin Rd NE
Cedar Rapids, IA, 52402
Linn County

Ship To
SAME

Description

Amount

Amount Paid
\$0.00

\$0.00
\$17,343.95

Discount
\$0.00

Shipping Cost
\$0.00

Sub Total
\$17,343.95

Total
\$17,343.95

0 - 30 days	31 - 60 days	61 - 90 days	> 90 days	Total
\$33,343.95	\$0.00	\$0.00	\$45,600.07	\$78,944.02